

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

TEMI BAMGBOSE, on behalf of themselves and all other similarly situated employees,

Plaintiffs,

- VS -

DELTA-T GROUP, INC., et al.

Defendants.

09-CV-667 MAM

**MOTION TO STRIKE LEGAL CONCLUSIONS IN PLAINTIFF’S OPT-IN  
DECLARATIONS, STRIKE OPT-IN DECLARATIONS BASED ON  
CONTRADICTORY ADMISSIONS, AND STRIKE THE ENTIRE  
DECLARATION OF ED NASON**

Defendant Delta-T Group, Inc. (“Delta-T” or “Defendant”), by and through its attorneys, Seyfarth Shaw LLP, hereby respectfully requests that this Court strike the legal conclusions in all of Plaintiff’s opt-in declarations, the entirety of certain opt-in declarations, and the entire declaration of Ed Nason because: (1) Plaintiff’s opt-in declarations contain inadmissible legal conclusions that should be disregarded, (2) eight of the 22 opt-ins who filed declarations affirmatively posted their own resumes on websites stating that they were *independent contractors* with Delta-T, not employees, thereby contradicting their entire declarations, and (3) Ed Nason’s declaration contains inadmissible hearsay and speculation, and is entirely inadmissible because it does not contain first hand personal knowledge of relevant facts within the alleged limitations period. For these reasons, and those more fully stated in Delta-T’s accompanying memorandum of law, Delta-T requests that this Court grant Defendant’s Motion To Strike Legal Conclusions In Plaintiff’s Opt-In Declarations, Strike Opt-In Declarations Based

On Contradictory Admissions, And Strike The Entire Declaration Of Ed Nason, or for any other relief as may be deemed just.

**DATED: August 31, 2009**

Respectfully submitted,  
DELTA-T GROUP, INC.

By: /s/ Gerald L. Maatman, Jr.  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

I certify that on this date I caused a copy of the foregoing to be served upon the following counsel of record by the Court's Electronic Filing System, which would then electronically notify the following CM/ECF participants on this case:

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Dated: August 31, 2009

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